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September 13, 2023

VIA ECF

Hon. Michael E. Farbiarz, U.S.D.J.
U.S. District Court of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Airtech International Inc. v. Yim, *et al.*
Case No. 2:22-cv-00668-MEF-AME

Judge Farbiarz:

We write pursuant to the Court's directive at oral argument on September 6, 2023, for a joint status report as to the procedural status of the case and the pending application filed by Defendants. This letter being submitted jointly and with Plaintiff's consent.

Since the hearing before the Court, the parties have met and conferred regarding how the case may proceed to conclusion. To that end, the parties have agreed to exchange proposals for how they can resolve the pending motion to dissolve the temporary restraining order, and perhaps the entire case, including any monetary component of Plaintiff's claims. As of the time of this writing, both sides are conferring with their clients to determine if there is a mutually agreeable path forward, in particular on the injunctive relief issues. Accordingly, the parties respectfully request an additional two weeks to provide a more complete update to the Court on the status of the discussions between the parties.

In the event that the parties cannot resolve, at a minimum, the pending application before September 27, 2023, they will submit a joint letter no later than September 29, 2023 proposing how they will proceed on the application to dissolve the temporary restraints.

We respectfully request the Court's courtesies for the reasons explained above.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "K. J. Roberts", with a long horizontal flourish extending to the right.

Keith J. Roberts, Esq.